

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF LOUISIANA
FT. LAUDERDALE DIVISION

PHILIP SERPE,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 0:24-cv-61939-DSL
	:	
FEDERAL TRADE COMMISSION; AND	:	Hon. Judge David S. Leibowitz
HORSERACING INTEGRITY AND	:	
SAFETY AUTHORITY, INC.,	:	
	:	
Defendants.	:	
_____	:	

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Philip Serpe, by and through counsel, hereby moves, pursuant to Fed. R. Civ. P. 65(a), for a preliminary injunction against Defendants Federal Trade Commission and the Horseracing Integrity and Safety Authority, Inc.

In support of his motion, Plaintiff submits a legal memorandum and proposed order herewith.

Respectfully submitted,

/s/ Bradford J. Beilly
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Counsel for Plaintiff Philip Serpe

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2024, the forgoing was electronically filed with the Clerk of the Court by using the CM/ECF System, which will effectuate service upon all persons, and served the same day via U.S. Mail, postage prepaid, upon the following:

Federal Trade Commission
c/o Hon. Markenzy Lapointe, U.S. Attorney
U.S. Attorney's Office, Southern District of Florida
500 East Broward Boulevard
Ft. Lauderdale, FL 33394

Federal Trade Commission
Attn: Civil Process Clerk
U.S. Attorney General
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Horseracing Integrity and Safety Authority, Inc.
John C. Roach, Registered Agent
176 Pasadena Drive
Building One
Lexington, KY 40503

/s/ Bradford J. Beilly
Counsel for Plaintiff Philip Serpe